REMARKS/ARGUMENTS

Claims 1-12, 14-26 and 28-35 are now pending in the present application. Claims 14, 28, 35 and 36 have been amended, and Claims 13, 27 and 34 have been cancelled, herewith. Reconsideration of the pending claims is respectfully requested.

I. 35 U.S.C. § 102, Anticipation

Claims 13, 27, 34 and 36 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Pines et al. (U.S. Publication No. 2003/0007625 A1), hereinafter "Pines". This rejection is respectfully traversed.

Applicants have cancelled Claims 13, 27 and 34 herewith, without prejudice or disclaimer, such that this case can expeditiously pass to issuance. With respect to Claim 36, such claim has been amended to include the features recited in Claim 14. Amended Claim 34 is allowable for similar reasons to those given below with respect to Claim 14.

Therefore, the rejection of Claims 13, 27, 34 and 36 under 35 U.S.C. § 102(e) has been overcome.

II. 35 U.S.C. § 103, Obviousness

Claims 1, 6-8, 15, 20-22, 29 and 30 stand rejected under 35 U.S.C. § 103 as being unpatentable over Chang et al. (U.S. Patent No. 5,771,283), hereinafter "Chang" in view of Frey et al. (U.S. Patent No. 6,535,596 B1), hereinafter "Frey". This rejection is respectfully traversed.

Generally, the features of Claim 1 are directed to processing steps that are performed by the actual device that a user co-acts with to initiate a call (e.g. "*detecting an initiation of a call* *in the communications device*, wherein the call is initiated by *a user* *directly co-acting with* *the communication device*"). All of the reference passages that are cited as teaching the features of Claim 1 are performed in a telecommunication switch at a central office of a telephone network. It is commonly known that a central office does not initiate calls or have direct user co-action – instead the central office provides switching and other types of enhanced services to process a call that is initiated elsewhere.

Specifically with respect to Claim 1, such claim recites "A *method* *in a communications device* for initiating calls, *the method comprising: detecting an initiation of a call* *in the communications device*, wherein the call is initiated by *a user* *directly co-acting with the communication device*". As can be seen, the communication device itself - that the user directly co-acts with to initiate a call - performs the 'detecting' step. In rejecting this detecting step of Claim 1, the Examiner states that such detecting step is taught by Chang col. 4, lines 59-67. Applicants urge that there, Chang states (the entire paragraph is being reproduced herewith to provide the proper context for properly interpreting the description of this cited passage, with the specific passage cited by the Examiner being underlined):

> FIGS. 3A and 3B are divided flow diagrams of the steps performed in telecommunications system 200 for delivering enhanced caller ID service to a customer line in accordance with the method of the present invention. For purposes of example, assume that the above-mentioned relocated customer wishes to place an order with the PDS. The process begins in step 300 when the customer (hereinafter, the "caller") served by **originating switch 230** goes off-hook, and dials a destination directory number which is the PDS main location directory number "888-2338". In step 302, the ***originating switch*** **detects the off-hook signal**, and performs digit analysis of the destination directory number "713-888-2338". Although the caller actually dialed "888-2338", **originating switch 230** automatically pre-appends the NPA digits "713" to the dialed number, as is known in the art. The process continues to step 304 in which **originating switch 230** selects a call path to the switch that serves the destination directory number (terminating switch 270), as is known in the art. In this example, bidirectional trunk connection 259 is selected for establishing a connection between originating switch trunk facility 257 and terminating switch trunk facility 289. In step 305, **originating switch 230** retrieves necessary data including GID information, and formulates an initial address message including: the called (destination) directory number; the calling directory number; call path information (e.g. the trunk address); and geographic identification data unique to the originating switch. In this example, the IAM includes: destination directory number "713-888-5962"; calling directory number "708-555-1234"; call path information including trunk 259 address; and geographic identification data "713-777". In step 306, **originating switch 230** sends the IAM to terminating switch 270 via signaling network 220.

As can clearly be seen by this discussion, and as clearly depicted in Figures 3A-3B, it is the *originating switch 230* that performs all of these operations, including detecting an off-hook signal. The user's phone that the user directly co-acts with (e.g. the phones shown along the bottom of Figure 2) does not perform this switch off-hook detection. Thus, the claimed detecting step – which is performed in the communication device itself that the user directly co-acts with to initiate a call – is not taught by this cited Chang reference. Rather, this cited passage describes a central office switch performing an off-hook detection. Thus, for this reason alone it is urged that a proper prima facie showing of obviousness has not been established, and thus Claim 1 has been erroneously rejected[1].

Further with respect to Claim 1, it is urged that none of the cited references teach or suggest the claimed feature of "responsive to detecting the call, identifying a geographic identification based on a number assigned to the communications device", *where the geographic identification is performed by the communication device itself that the user directly co-acts with to initiate a call* (per the preamble in combination with the 'detecting' step). In rejecting this aspect of Claim 1, the Examiner cites Chang's teaching at col. 5, lines 1-20 as teaching such geographic identification step. Applicants urge that this cited passage, which is included in the reproduced Chang passage immediately above, states that *the central office switch performs all of the steps described in this cited passage*. Thus, contrary to the Examiner assertion, Chang does not describe at col. 5, lines 1-20 any type of geographic identification being performed in the communication device itself that the user directly co-acts with to initiate a call. Thus, it is further urged that a proper prima facie showing of obviousness has not been established, and thus Claim 1 has been erroneously rejected

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[1] To establish prima facie obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. *See also, In re Royka*, 490 F.2d 580 (C.C.P.A. 1974). If the examiner fails to establish a prima facie case, the rejection is improper and will be overturned. *In re Fine*, 837 F.2d 1071, 1074, 5 USPQ2d 1596, 1598 (Fed. Cir. 1988).

Still further with respect to Claim 1, it is urged that none of the cited references teach or suggest the claimed feature of "identifying at least one of a geographic identification *based on a number assigned to the communications device*", with the communication device for which the number is assigned being the communication device that the user directly co-acts with to initiate a call (per the preamble in combination with the 'detecting' step). In rejecting this aspect to Claim 1, the Examiner cites Chang's teachings at column 5, lines 1-20 and FIGS 3A-3B as teaching this claimed feature. Applicants show that there, Chang states:

> "Although the caller actually dialed "888-2338", originating switch 230 automatically pre-appends the NPA digits "713" to the dialed number, as is known in the art. The process continues to step 304 in which originating switch 230 selects a call path to the switch that serves the destination directory number (terminating switch 270), as is known in the art. In this example, bidirectional trunk connection 259 is selected for establishing a connection between originating switch trunk facility 257 and terminating switch trunk facility 289. *In step 305, originating switch 230 retrieves necessary data including GID information, and formulates an initial address message including: the called (destination) directory number; the calling directory number; call path information (e.g. the trunk address); and geographic identification data unique to the originating* ***switch***. In this example, the IAM includes: destination directory number "713-888-5962"; calling directory number "708-555-1234"; call path information including trunk 259 address; and geographic identification data "713-777". In step 306, originating switch 230 sends the IAM to terminating switch 270 via signaling network 220" (emphasis added).

As can be seen, this passage describes that geographic identification data *unique to the originating switch* is included in an initial address message. This can also be seen in Chang's FIG. 2, where the *geographic identifier GID 241 is maintained internal to switch 230*. In contrast, Claim 1 is directed to a geographic identifier for the end-user device, such as device 400 shown in Figure 4 of Applicants' drawings. Per Claim 1, the claimed invention advantageously provides a more 'personal' indication of the actual user's characteristics, such as geographic location/language capabilities, as the geographic/language indicators *are specific to the end-user device*. The teachings of the cited Chang reference merely provide the location of a central office switch, which does not indicate the geographic/language information *for the* user, but rather provides a geographic location *for the switch*. This can clearly be seen by Chang's teaching at col. 5, lines 14-15, where he states that the "geographic identification data *unique to the originating switch*" (emphasis added). It is thus further urged that Claim 1 has been erroneously rejected under 35 USC 103, as a proper prima facie showing of obviousness has not been established.

Further yet with respect to Claim 1, such claim recites "responsive to detecting the call, identifying ... a language identification based on the user of the communications device; and transmitting the geographic identification and the language identification with caller identification information for use by a called party", where the language identification and transmitting steps are performed by the communication device itself that the user directly co-acts with to initiate a call (per the preamble in combination with the 'detecting' step). In rejecting this aspect of Claim 1, the Examiner cites Frey's teaching at col. 7, lines 36-41 and col. 9, lines 1-8 as teaching these claimed steps. As to the Fray description at col. 7, this passage describes that the subscriber profile module may prompt the party to provide subscriber service information such as a language preference. However, this information is stored in a profile such that it can be retrieved during a call (col. 9, lines 30-61). Importantly, this information is not transmitted, along with geographic information and caller identification information, *by the communication device* itself that the user directly co-acts with to initiate a call. Instead, as described by Frey at the Examiner cited passage at col. 9, lines 1-8, the call behavior module 130 – *which is also a part of a central office switch* (see, e.g., Figure 1, element 130) - internally gathers the information that is to be sent to the called party. Thus, it is further shown that Claim 1 has been erroneously rejected, as a proper prima facie case of obviousness has not been properly established by the Examiner.

Quite simply, the references teach operations performed by a central office switch, whereas the steps recited in Claim 1 are performed by an end-user device. Thus, it is urged that Claim 1 is not obvious in view of the cited references due to this substantial difference in overall system architecture and operations pertaining thereto.

Applicants initially traverse the rejection of Claims 6-8 for reasons given above with respect to Claim 1 (of which Claims 6-8 depend upon).

Further with respect to Claim 6, such claim recites "wherein the device has Bluetooth wireless communication capability that is used to access the language identification stored in the device". As can be seen, a *wireless communication capability* is used to access the *language identification* stored in the device. In rejecting Claim 6, the Examiner asserts that this wireless functionality is taught by Chang at col. 3, lines 49-54. Applicants urge that there, Chang states:

> SM 236 comprises controller 238 for module control, memory 240 for storing information including **geographic identification** data (GID) 241 and network element

> 245. In the preferred embodiment, SM memory 240 is initialized with GID 241 which is the LRN identifier of switch 230 "713-777".

As can be seen, this cited passage is directed to the storage of geographic identification data in a switch. This is different from the features of Claim 6 for several reasons. First, Claim 6 is directed to a particular capability (wireless) for accessing the *language identification* that is stored in the end-user communication device. This cited passage discusses *geographic identification* – and not *language identification*, as claimed. The Examiner themselves expressly acknowledges that the cited Change reference does not teach *any* language identification features[2], so it is unclear how Chang can teach particular capabilities (wireless) used to access a non-existent (language identification) feature. Second, the cited Change reference does not contemplate *any* type of wireless communication capability – either as per the particular claimed features recited in Claim 6, or otherwise. Thus, contrary to the Examiner's assertion, the Chang reference does not in fact teach or suggest "wherein the device has Bluetooth wireless communication capability that is used to access the language identification stored in the device", as expressly recited in Claim 6. Thus, it is further urged that Claim 6 has been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Further with respect to Claim 7, such claim recites "wherein the communications device is a mobile communications unit". As can be seen, the communication device which the user directly co-acts with to initiate a call is a mobile communication device. In rejecting Claim 7, the Examiner alleges that this claimed mobile communication device feature is taught by Chang at col. 4, lines 1-7. Applicants show that there, Chang states:

> Trunk facility 257 coordinates trunk connections between switch 230 and other network nodes, including the public switched telephone network (PSTN) 299, as is known in the art. Line unit 256 is interconnected to network element 258 by link 253, and acts as an interface between switch 230 and customer line 251. Customer line 251 serves the PDS branch location, and is identified by directory number "713-777-5962".

As can be seen, this cited passage discusses details of the central office switch 230 (see, e.g., Chang Figure 2), and does not describe any features pertaining to a communication device which the user directly co-acts with to initiate a call. Further still, this cited passage does not describe any type of mobile communication device, either as per the particular features of Claim 7, or otherwise. Thus, it is further urged that Claim 7 has been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

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[2] On page 4 of the present Office Action dated May 11, 2007, the Examiner states "Chang discloses transmitting to the called party the geographic location **but fails to disclose a language identification** based on a user of the communication device" (emphasis added by Applicants).

With respect to Claim 8, such claim recites:

> A method in a communications device for receiving a call, the method comprising:
>
> responsive to detecting an incoming call from a caller, determining whether a geographic identification and a language identification is present, wherein the language identifier identifies at least one language spoken by the caller; and
>
> responsive to the geographic identification and the language identification being present, presenting the geographic identification and the language identification to the called party, wherein the geographic identification and the language identification are used to identify the geographic location of the origin of the call and the at least one language spoken by the caller.

As can be seen, Claim 8 is directed to a method performed by a *communication device that receives a call*. In rejecting Claim 8, the Examiner relies on alleged teachings regarding Claim 1 as the rationale for rejecting Claim 8. It is urged that Claim 8 is substantially different from Claim 1, and thus using the same reasoning in the Claim 1 rejection and the Claim 8 rejection does not establish that all steps recited in Claim 8 are taught or suggested by the cited references. Thus, it is urged that Claim 8 has been erroneously rejected as the Examiner has failed to establish, or even allege, that the cited reference teaches the claimed steps performed by a *communication device that receives a call* of (i) "responsive to detecting an coming call from a caller, determining whether at least one of a geographic identification and a language identification is present, wherein the language identifier identifies languages spoken by the caller", or (ii) "responsive to the at least one of the geographic identification and the language identification being present, presenting the at least one of the geographic identification and language identification to the called party, wherein the at least one of the geographic identification and language identification is used to identify the at least one of the geographic location of the origin of the call and a language spoken by the caller". Thus, it is urged that Claim 8 has been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Applicants traverse the rejection of Claims 15, 20, 21 and 29 for similar reasons to those given above with respect to Claim 1.

Applicants further traverse the rejection of Claim 20 for similar reasons to the further reasons given above with respect to Claim 6.

Applicants further traverse the rejection of Claim 21 for similar reasons to the further reasons given above with respect to Claim 7.

Applicants traverse the rejection of Claims 22 and 30 for similar reasons to those given above with respect to Claim 8.

Therefore, the rejection of Claims 1, 6-8, 15, 20-22, 29 and 30 under 35 U.S.C. § 103 has been overcome.

III. 35 U.S.C. § 103, Obviousness

Claims 2, 10, 16 and 24 stand rejected under 35 U.S.C. § 103 as being unpatentable over Chang in view of Frey as applied to Claims 1, 8, 15 and 22 above, and further in view of Caccuro et al. (U.S. Patent No. 5,440,615), hereinafter "Caccuro". This rejection is respectfully traversed.

Applicants initially traverse the rejection of Claims 2 and 16 for similar reasons to those given above with respect to Claim 1, as the additional cited Caccuro reference does not overcome the teaching deficiencies identified above with respect to Claim 1.

Further with respect to Claim 2 (and similarly for Claim 16), such claim recites "wherein the language identification is a list of languages in a code format". As can be seen, per the features of Claim 2 the language identification that is (i) identified *based on the user of the communications device*, and (ii) *transmitted with caller identification information* for use by a called party, is a list of languages in a code format. In rejecting this aspect of the language identification features, the Examiner alleges that Caccuro teaches such features at Caccuro Figure 4 and col. 4, lines 45-63. Applicants urge error, as this table is maintained by voice messaging system 113's database 303 (col. 4, lines 20-49), and therefore this information is not identified based on the user of the communication device, nor is this information transmitted with caller identification information for use by a called party, as required by the features of Claim 2 in combination with Claim 1. Importantly, *this list is not used by a communication device (as defined per Claim 1) at all*, but rather is maintained in a separate and distinct voice messaging system coupled to a network switch (Caccuro Figure 1) for prompting a user to select a preferred language (col. 6, lines 12-19). Thus, it is further urged that Claims 2 and 16 have been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Applicants initially traverse the rejection of Claims 10 and 24 for similar reasons to those given above with respect to Claim 8, as the additional cited Caccuro reference does not overcome the teaching deficiencies identified above with respect to Claim 8.

Further with respect to Claim 10 (and similarly for Claim 24), such claim recites "wherein the language identification is a list of language codes containing at least one language code indicating a language spoken by the caller". As can be seen, the list of language codes contain at least one language code indicating a language spoken by the caller. For similar reasons to those described above with respect to Claim 2, the Caccuro table depicted in Figure 4 contains no caller-specific information, but instead is a list of 'message prompt' languages that are presented to a caller in a prompt (Caccuro col. 6, lines 12-50). While this list is used in an attempt to determine a caller's language, *this table does not indicate a language spoken* *by* *the caller* (col. 6, lines 25-29). Instead, it is a *table of languages spoken* *to* *a caller* with no assurance that the caller speaks any of these languages. Thus, it is further urged that Claims 10 and 24 have been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Therefore, the rejection of Claims 2, 10, 16 and 24 under 35 U.S.C. § 103 has been overcome.

IV. 35 U.S.C. § 103, Obviousness

Claims 3 and 17 stand rejected under 35 U.S.C. § 103 as being unpatentable over Chang in view of Frey as applied to Claims 1 and 15 above, and further in view of Guo (U.S. Publication No. 2002/0174059). This rejection is respectfully traversed.

Applicants initially traverse the rejection of Claims 3 and 17 for similar reasons to those given above with respect to Claim 1, as the additional cited Guo reference does not overcome the teaching deficiencies identified above with respect to Claim 1.

Further with respect to Claim 3 (and similarly for Claim 17), such claim recites "wherein the geographic identification is in a two letter code format". As can be seen, per the features of Claim 3 the geographic identification that is (i) identified based on a number assigned to the communications device, and (ii) transmitted with caller identification information for use by a called party, is in a two letter code format. In rejecting this aspect of the geographic identification features, the Examiner alleges that Guo teaches such features at Guo Figure 26 and paragraph 0129. Applicants urge error, in that there Guo describes a six (6) digit zip code to define a specific geographic location ("The **6-digit GCIS Zip Code** 21 *defines a specific geographic location*"). In contrast, Claim 2 expressly recites a two letter code format that is used for the geographic identification. In addition, this 6-digit GCIS Zip Code is not identified based on a number assigned by the communication device, as required by the features of Claim 3 in combination with Claim 1 (of which Claim 3 depends upon), but instead is an information string architecture used to describe commodities in a buyer/seller e-market (Guo paragraph [0021]). Further yet, this 6-digit GCIS Zip Code is not transmitted with caller identification information for use by a called party, as required by the features of Claim 3 in combination with Claim 1 (of which Claim 3 depends upon), but instead is an information string architecture used to describe commodities in a buyer/seller e-market (Guo paragraph [0021]). Thus, it is urged that Claims 3 and 17 have been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Therefore, the rejection of Claims 3 and 17 under 35 U.S.C. § 103 has been overcome.

V. 35 U.S.C. § 103, Obviousness

Claims 4, 5, 9-12, 18, 19, 23, 25, 26 and 31-33 stand rejected under 35 U.S.C. § 103 as being unpatentable over Chang in view of Frey as applied to Claims 1, 8, 15, 22 and 30 above, and further in view of Fung et al. (U.S. Patent No. 6,069,939), hereinafter "Fung". This rejection is respectfully traversed.

Applicants initially traverse the rejection of Claims 4, 5, 18 and 19 for similar reasons to those given above with respect to Claim 1, as the additional cited Fung reference does not overcome the teaching deficiencies identified above with respect to Claim 1.

Further with respect to Claim 5 (and similarly for Claim 19), such claim recites "wherein the language identification is stored in a device accessible by the communications device using a wireless communication link". As can be seen, Claim 5 is directed to particular features associated with the storage and access of the language identification, where the language identification is stored in a device that is accessible by the communication device using a wireless communication link. In rejecting Claim 5, the Examiner alleges that all of the features of Claim 5 are taught by Fung at Figure 4 and col. 6, lines 33-39). Applicants urge that there, Fung states:

> The caller may select French for prompts/announcements in a call to their French-speaking mother in Japan. Thus, they may store a personal selection of languages for countries, cities even individuals they plan to call. Otherwise, a language/dialect choice may be made automatically for the caller based on the dialed digits of the call.

As can be seen, this cited passage describes a caller selection feature whereby a caller selects a desired language, which can be stored. This cited passage does not describe *how the language identification is accessed by a communication device*, and such cited passage does not describe *any use of a wireless communication link*, as expressly recited in Claim 5. Thus, it is further urged that Claims 5 and 19 have been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Applicants initially traverse the rejection of Claims 9-12, 23, 25, 26 and 31-33 for similar reasons to those given above with respect to Claim 8, as the additional cited Fung reference does not overcome the teaching deficiencies identified above with respect to Claim 8.

Further with respect to Claim 9 (and similarly for Claims 10-12, 23, 25, 26 and 31-33), such claim recites "responsive to the language identification being present, determining whether the language identification matches a language selected by the called party". As can be seen, there are several aspects to Claim 9. First, the language identification determination is done in response to the language identification *being present.* Second, a determination is made as to whether the language identification *matches a language selected by the called party.* In rejecting Claim 9, the Examiner states that all of the features recited in Claim 9 are taught by Fung at Figure 4 and col. 6, lines 33-39. This col. 6 citation has been reproduced above (in the Claim 5 discussion), and merely describes actions associated with a *calling party* – including a calling party selecting a language, and the storing of selected language(s). This is different from what is recited in Claim 9 for at least three reasons. First, these Fung actions are not done in response to a language identification being present. Second, there is no type of language matching determination. Claim 9 expressly recites "determining whether the language identification *matches a language* selected by the called party". Third, these Fung actions are with respect to a *calling party,* whereas per the features of Claim 9 a determination is made as to whether the language identification matches *a language selected by the called party.* Thus, it is further urged that Claims 9, 10-12, 23, 25, 26 and 31-33 have been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Further with respect to Claim 11 (and similarly for Claims 25 and 32), such claim recites "responsive to an absence of a matching language, initiating a translation process". As can be seen, a translation process is initiated in response to an absence of a matching language (as determined by the features of Claim 9). In rejecting Claim 11, the Examiner states that all of the features recited in Claim 11 are taught by Fung at Figure 4 and col. 6, lines 33-39. This col. 6 citation has been reproduced above (in the Claim 5 discussion), and merely describes actions associated with a calling party – including a calling party selecting a language, and the storing of selected language(s). There is no translation process described at all, either per the particular features of Claim 11, or otherwise. Thus, it is further urged that Claims 11, 25 and 32 have been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Further with respect to Claim 12 (and similarly for Claims 26 and 33), such claim recites "responsive to an absence of a matching language, forwarding the call to a call center". As can be seen, a forwarding of the call to a call center is done in response to an absence of a matching language (as determined by the features of Claim 9). In rejecting Claim 12, the Examiner states that all of the features recited in Claim 12 are taught by Fung at Figure 4 and col. 6, lines 33-39. This col. 6 citation has been reproduced above (in the Claim 5 discussion), and merely describes actions associated with a calling party – including a calling party selecting a language, and the storing of selected language(s). There is no forwarding of a call to a call center described at all, either per the particular features of Claim 12, or otherwise. Thus, it is further urged that Claims 12, 26 and 33 have been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Therefore, the rejection of Claims 4, 5, 9-12, 18, 19, 23, 25, 26 and 31-33 under 35 U.S.C. § 103 has been overcome.

VI. 35 U.S.C. § 103, Obviousness

Claims 14, 28 and 35 stand rejected under 35 U.S.C. § 103 as being unpatentable over Pines in view of Alshawi et al. (U.S. Publication No. 2004/0204940 A1), hereinafter "Alshawi". This rejection is respectfully traversed.

It should initially be noted that each of these claims has merely been amended as to form, to be in independent form – and these claims have not been substantitively amended for purposes of overcoming a rejection.

With respect to Claims 14, 28 and 35, Applicants urge that none of the cited references teach or suggest the claimed feature of "wherein the destination is a help desk associated with a language identified by the language identifier". As can be seen, the destination for a received call is a help desk associated with a language identified by a language identifier. In rejecting Claim 14, the Examiner acknowledges that the cited Pine reference does not teach/suggest this claimed feature, but states that Alshawi teaches this claimed feature at paragraph [0006]. Applicants urge that there, Alshawi states:

> [0006] Several technology requirements exist for voice-enabling Help Desk applications, including having a speech recognizer that is capable of recognizing a large-vocabulary spontaneous speech and supporting barge-in, a spoken language understanding (SLU) unit that parses the natural language input into relevant information, a dialog manager that operates in a mixed-initiative mode, and a text-to-speech synthesizer that is able to generate high-quality synthesized voice statements to the user.

As can be seen, this cited passage states that a speech recognizer is able to recognize spontaneous speech to provide voice-enabling help desk applications. In other words, the actual spoken voice is converted to text, for subsequent processing (Alshawi paragraph [0007]). In contrast, Claim 14 is directed to actual *routing of a call to a particular help desk based on a language identifier that is received as a part of a received call.* None of the cited references teach or suggest this language identifier call routing feature. Thus, it is thus urged that Claims 14, 28 and 35 have been erroneously rejected, as a proper prima facie case of obviousness has not been established due to the above identified missing claimed features that are not taught or suggested by the cited references.

Therefore, the rejection of Claims 14, 28 and 35 under 35 U.S.C. § 103 has been overcome.

VII. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: August 10, 2007

Respectfully submitted,

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